



IN THE UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

United States of America

V.

Robert Updegrave,
Defendant

Criminal No. 1:07CR434

Sentencing 1/25/08
Judge Ellis

MOTION FOR JUDICIAL RECOMMENDATION OF PRISON DESIGNATION

Comes now the defendant, Robert Updegrave, by counsel, and moves that this Court add to its final order in this case a judicial recommendation that defendant Updegrave serve his sentence at FCI Allenwood.

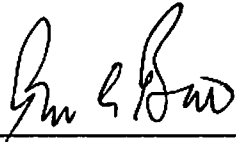
In support of this motion, counsel for defendant states as follows:

1. Counsel was contacted by family members of Updegrove after Updegrove was sentenced on January 25, 2008. They stated that their understanding was that the Bureau of Prisons would use the sentencing location of Alexandria Virginia in an attempt to secure a placement as close as possible from that location. However, defendant's 84-year-old mother, who lives by herself in Shiremanstown, Pennsylvania and rarely drives, would like the opportunity to visit Updegrove in prison. FCI Allenwood is the closest federal prison to her. It is only 76 miles from Shiremanstown, whereas the closest facility to Alexandria, FCI Petersburg is 237 miles from Shiremanstown.

Robert E.
Battle, P.C.
Richmond, VA

Therefore, defendant, by counsel, requests that the Final Order or an addendum to the Order include a judicial recommendation for placement at FCI Allenwood.

Respectfully submitted,
ROBERT UPDEGROVE
By Counsel



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Certificate of Service

I hereby certify that a copy of this document was:
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